

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH MULL, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

GOTHAM DISTRIBUTING CORPORATION,  
MVD ENTERTAINMENT GROUP, and OLD  
SCHOOL VENTURES, INC., individually and  
collectively d/b/a OLDIES.COM,

Defendants.

Case No. 2:24-cv-06083-GJP

JUDGE GERALD J. PAPPERT

**STIPULATION AND ORDER CONSOLIDATING AND EXTENDING BRIEFING  
SCHEDULE ON DEFENDANT OLD SCHOOL VENTURES, INC.'S MOTION  
TO DISMISS**

WHEREAS, on November 13, 2024, Plaintiff Joseph Mull (“Plaintiff”) commenced this putative class action;

WHEREAS, on March 20, 2025, Plaintiff moved for leave to file an amended complaint. (ECF No. 17);

WHEREAS, on May 2, 2025, the Court granted Plaintiff leave to file an amended complaint by May 8, 2025. (ECF No. 18);

WHEREAS, on May 5, 2025, Plaintiff filed a First Amended Complaint. (ECF No. 19);

WHEREAS, Defendant MVD Entertainment Group (“MVD”) was served on May 7, 2025;

WHEREAS, on May 19, 2025, Defendant Old School Ventures, Inc. (“OSV”) filed a motion to dismiss the First Amended Complaint. (ECF No. 21);

WHEREAS, Plaintiff's response to Defendant OSV's motion is due on June 2, 2025;

WHEREAS, on May 22, 2025, Defendant Gotham Distributing Corporation ("Gotham") filed a motion to dismiss the First Amended Complaint that incorporated all arguments made by Defendant OSV. (ECF No. 22);

WHEREAS, Plaintiff's response to Defendant Gotham's motion is due on June 5, 2025;

WHEREAS, Defendant MVD's answer or motion to dismiss was due on May 28, 2025;

WHEREAS, Plaintiff has been advised that Defendant MVD has not yet formally retained counsel. Accordingly, Plaintiff consents to a two-week extension of time for Defendant MVD to appear through counsel and respond to the complaint on or before June 11, 2025;

WHEREAS, Plaintiff and Defendant OSV have agreed to a 30-day extension of time for Plaintiff to file an omnibus response to all motions to dismiss, and a 7-day extension for Defendant OSV to file its reply. Good cause exists for this extension because it conserves judicial resources by streamlining the responses and reduces the burden on the parties.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, subject to the Court's approval, that:

1. Plaintiff shall respond to Defendant OSV's motion to dismiss on or before July 9, 2025.
2. Defendant OSV shall file its reply in support of its motion to dismiss on or before July 23, 2025.

Dated: May 29, 2025

Respectfully submitted,

/s/ Noelle B. Torrice (w/ permission)  
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*Counsel to Plaintiff*

*Counsel to Defendant Old School  
Ventures, Inc.*

SO ORDERED, this 30th, day of May 2025.

/s/ Gerald J. Pappert  
The Honorable Gerald J. Pappert  
United States District Judge